Section 7
Modifications Requested with Renewal

USA LAMP & BALLAST RECYCLING

Mason, MI • Lakeville, MN • Cincinnati, OH • Spartanburg, SC

USA LAMP & BALLAST RECYCLING, INC
7806 Anthony Wayne Avenue, Cincinnati, OH 45216
513.641.4155 phone / 513.641.4156 fax
usalamp@usalamp.com email
www.usalamp.com

March 11, 2017

Director Scott J. Nally
Ohio Environmental Protection Agency

Attn: Mr. Jeremy Carroll, Manager
Division of Materials and Waste Management
Engineering, Remediation, and Authorizing Section
Lazarus Government Center
50 West Town Street, Suite 700
Columbus, OH 43215

RE: USA Lamp & Ballast Recycling, Inc (OHR-000-109-819)
Class 1 Modification Associated with Permit Renewal

Dear Mr. Carroll,

USA Lamp & Ballast Recycling, Inc (OHR-000-109-819) is submitting the enclosed Class 1 modification in conjunction with our Part B Hazardous Waste Permit Renewal

Enclosed you will find the following updated pages:

- RCRA Subtitle C Site Identification update, Pages 48 – 50
- Hazardous Waste Permit Information Form update, Pages 8 - 14
- Section B Facility Description B-1, contacts, page 52
- Emergency Response Contingency Plan, Attachment 2, Page 133
- Emergency Response Contingency Plan, Attachment 7, Page 138
- Emergency Response Contingency Plan, Attachment 8, Page 139
- Closure Plan, Section 1, Closure Cost, Page 165
- Closure Plan, Trust Agreement, Page 167
- Closure Plan, Certificate of Insurance, Page 179

Please do not hesitate to contact me or David Dempsey (864.316.4462 / david.dempsey@usalamp.com) with any questions or comments.

> *"I certify under penalty of law that this document and all attachments were prepared under my supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."*

Respectfully submitted,

Thomas M Kimmel
President
517.676.0044 phone
usalamp@usalamp.com email

Cc: Ms. Cathy Altman, DMWM – Southwest District Office

Enclosures:

MAIL THE COMPLETED FORM TO: Ohio EPA, DMWM, P.O. Box 1049, Columbus, OH 43216-1049	Ohio Environmental Protection Agency **RCRA SUBTITLE C SITE IDENTIFICATION**	For Ohio EPA Use Only

1. Reason for Submittal	**Reason for Submittal:** ☐ To provide initial notification (to obtain an EPA ID Number for hazardous waste, universal waste, or used oil activities). ☐ To provide subsequent notification (to update site identification information). ☐ As a component of a First RCRA Hazardous Waste Part A Permit Application. ☒ As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # 1) ☐ As a component of the Hazardous Waste Report for the year _____.
2. Site EPA ID No.	**EPA ID Number:** OHR-000-109-819
3. Site Name	**Name:** USA Lamp & Ballast Recycling, Inc.
4. Site Location Information	**Street Address:** 7806 Anthony Wayne Avenue **City, Town, or Village:** Cincinnati — **County:** Hamilton **State:** OH — **Country:** US — **Zip Code:** 45216
5. Site Land Type	**Site Land Type:** ☒ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other
6. North American Industry Class. System (NAICS) Code(s) for the Site	**A.** (Primary) 56200 — **B.** 33511 **C.** — **D.**
7. Site Contact Person:	**First Name:** Benny — **MI:** — **Last Name:** Coyt **Title:** EHS Manager **Street or P.O. Box:** 7806 Anthony Wayne Avenue **City, Town or Village:** Cincinnati **State:** OH — **Country:** US — **Zip Code:** 45216 **E-mail:** benny.coyt@cleanlites.com **Phone & Ext.:** 513-766-0318 — **Fax:** 513.641.4156
8. Legal Owner and Operator of the Site Additional Owners and/or Operators should be listed in the Comment Section or on another copy of this form page.	**A. Name of Site's Legal Owner:** USA Lamp & Ballast Recycling, Inc. — **Date Became Owner (mm/dd/yyyy):** / / 06/30/2004 **Owner Type:** ☐ Private ☒ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other **Street or P.O. Box:** 7806 Anthony Wayne Avenue **City, Town, or Village:** Cincnnati — **Phone:** 513.641.4155 **State:** OH — **Country:** US — **Zip Code:** 45216 **B. Name of Site's Operator:** USA Lamp & Ballast Recycling, Inc. — **Date Became Operator (mm/dd/yyyy):** / / 06/30/2002 **Operator Type:** ☒ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other **Street or P.O. Box:** 7806 Anthony Wayne Avenue **City, Town, or Village:** Cincinnati — **Phone:** 513.641.4155 **State:** OH — **Country:** US — **Zip Code:** 45216

9. Type of Regulated Waste Activity (Mark "X" in the appropriate boxes.)

A. Hazardous Waste Activities

1. Generator of Hazardous Waste
(choose only one of the following three categories or leave blank if not applicable)

- [X] a. **Large Quantity Generator (LQG):** Greater than 1,000 kg/mo (2,200 lbs.) of non-acute hazardous waste; or
- [ ] b. **Small Quantity Generator (SQG)** 100 to 1,000 kg/mo (220-2,200 lbs.) of non-acute hazardous waste; or
- [ ] c. **Conditionally Exempt Small Quantity Generator (CESQG):** Less than 100 kg/mo of non-acute hazardous waste

In addition, indicate other generator activities (check all that apply)

- [ ] d. Short-Term Generator (generate from a short-term or one-time event and not from on-going processes). If "Yes", provide an explanation in the Comments section.
- [ ] e. United States Importer of Hazardous Waste
- [ ] f. Mixed Waste (hazardous and radioactive) Generator

2. Hazardous Waste Report Generator Status
(choose one if a Reason for Submittal is the Hazardous Waste Report)

- [ ] a. **Large Quantity Generator (LQG):** Greater than 1,000 kg/mo (2,200 lbs.) of non-acute hazardous waste was generated at the site in any one month. or
- [ ] b. **Small Quantity Generator (SQG)** In one or more months the site generated greater than 100kg (220 lbs) but in no month did it generate more than 1,000 kg/mo (220-2,200 lbs) of non-acute hazardous waste, or
- [ ] c. **Conditionally Exempt Small Quantity Generator (CESQG):** The site generated no more than 100 kg (220 lbs) of non-acute hazardous waste in any one month.
- [ ] d. **Non-Generator** The site did not generate any hazardous waste during the calendar year.

For Items 3 through 7, check all that apply:

3. Transporter of Hazardous Waste
- [X] a. Transporter
- [X] b. Transfer Facility (at your site)

- [X] **4. Treater, Storer or Disposer of Hazardous Waste (at your site)** Note: A hazardous waste permit is required for this activity.
- [X] **5. Recycler of Hazardous Waste (at your site)** Note: A hazardous waste permit may be required for this activity.
  - [ ] a. 72-hour Recycler

6. Exempt Boiler and/or Industrial Furnace
- [ ] a. Small Quantity On-site Burner Exemption
- [ ] b. Smelting, Melting and Refining Furnace Exemption

- [ ] **7. Underground Injection Control**
- [X] **8. Receives Hazardous Waste from Off-site**

B. Universal Waste Activities

- [ ] **1. Large Quantity Handler of Universal Waste (accumulate 5,000 kg or more). Indicate types of universal waste managed at your site. (check all boxes that apply):**

	Managed
a. Batteries	[X]
b. Pesticides	[ ]
c. Mercury Containing Equipment	[X]
d. Lamps	[X]

- [X] **2. Destination Facility for Universal Waste** Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities

1. Used Oil Transporter
Indicate Type(s) of Activity(ies)
- [ ] a. Transporter
- [ ] b. Transfer Facility (at your site)

2. Used Oil Processor and/or Re-refiner
Indicate Type(s) of Activity(ies)
- [ ] a. Processor
- [ ] b. Re-refiner

- [ ] **3. Off-Specification Used Oil Burner**

4. Used Oil Fuel Marketer -
Indicate Type(s) of Activity(ies)
- [ ] a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
- [ ] b. Marketer Who First Claims the Used Oil Meets the Specifications

D. Eligible Academic Entities with Laboratories – Notification for opting into or withdrawing from managing laboratory hazardous wastes pursuant to OAC rules 3745-52-200 through 3745-52-216

☐ 1. Opting into or currently operating under OAC rules 3745-52-200 through 3745-52-216 for the management of hazardous wastes in laboratories. **Mark all that apply:**

- ☐ a. College or University
- ☐ b. Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university
- ☐ c. Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university

☐ 2. Withdrawing from OAC rules 3745-52-200 through 3745-53-216 for the management of hazardous waste in laboratories

10. Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more space is needed.

D001	D002	D003	D004	D005	D006	D007
D008	D009	D010	D011	D051		

11. Comments

USA Lamp & Ballast Recycling, Inc. is a destination facility for Universal Waste lamps, mercury containing items, electronic waste, and batteries. Lamps are crushed and separated by material type then recycled through other facilities. Electronic wastes are dissembled and recycled to other facilities. Mercury from the lamp process and all other mercury containing materials is recycled at the facility. All residuals and debris from the mercury recycling process is recycled through other facilities.

12. Certification. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of owner, operator, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm-dd-yyyy)
	Thomas M. Kimmel, President & CEO	

EPA ID Number | O | H | R | 0 | 0 | 0 | 1 | 0 | 9 | 8 | 1 | 9 |

OMB#: 2050-0024; Expires 01/31/2017

United States Environmental Protection Agency

HAZARDOUS WASTE PERMIT INFORMATION FORM

1. Facility Permit Contact	**First Name:** Timothy	**MI:** M	**Last Name:** Kimmel
	Contact Title: VP Sales & Marketing		
	Phone: 513.641.4155	**Ext.:**	**Email:** timothy.kimmel@usalamp.com
2. Facility Permit Contact Mailing Address	**Street or P.O. Box:** 7806 Anthony Wayne Avenue		
	City, Town, or Village: Cincinnati		
	State: OH		
	Country: USA	**Zip Code:** 45216	
3. Operator Mailing Address and Telephone Number	**Street or P.O. Box:** 7806 Anthony Wayne Avenue		
	City, Town, or Village: Xincinnati		
	State: OH	**Phone:** 513.641.4155	
	Country: USA	**Zip Code:** 45216	
4. Facility Existence Date	**Facility Existence Date (mm/dd/yyyy):** 06/30/2002		

5. Other Environmental Permits

A. Facility Type *(Enter code)*	B. Permit Number	C. Description
E	P 0 1 0 8 5 6 7	PTI & PTO Fluorescent Lamp Processor

6. Nature of Business: USA Lamp & Ballast Recycling, Inc. is a destination facility for Universal Waste lamps, mercury containing items, electronic waste, and batteries. Lamps are crushed and separated by material type, then recycled through other facilities. Electronic wastes are disassembled and recycled to other facilities. Mercury from mercury containing materials is recycled at this facility. All residuals and debris from the mercury recycle process are recycled through other facilities.

7. Process Codes and Design Capacities – Enter information in the Section on Form Page 3

A. PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. If more lines are needed, attach a separate sheet of paper with the additional information. For "other" processes (i.e., D99, S99, T04 and X99), describe the process (including its design capacity) in the space provided in Item 8.

B. PROCESS DESIGN CAPACITY – For each code entered in Item 7.A; enter the capacity of the process.

1. **AMOUNT – Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process.**
2. **UNIT OF MEASURE – For each amount entered in Item 7.B(1), enter the code in Item 7.B(2) from the list of unit of measure codes below that describes the unit of measure used. Select only from the units of measure in this list.**

C. PROCESS TOTAL NUMBER OF UNITS – Enter the total number of units for each corresponding process code.

Process Code	Process	Appropriate Unit of Measure for Process Design Capacity
Disposal		
D79	Underground Injection Well Disposal	Gallons; Liters; Gallons Per Day; or Liters Per Day
D80	Landfill	Acre-feet; Hectares-meter; Acres; Cubic Meters; Hectares; Cubic Yards
D81	Land Treatment	Acres or Hectares
D82	Ocean Disposal	Gallons Per Day or Liters Per Day
D83	Surface Impoundment Disposal	Gallons; Liters; Cubic Meters; or Cubic Yards
D99	Other Disposal	Any Unit of Measure Listed Below
Storage		
S01	Container	Gallons; Liters; Cubic Meters; or Cubic Yards
S02	Tank Storage	Gallons; Liters; Cubic Meters; or Cubic Yards
S03	Waste Pile	Cubic Yards or Cubic Meters
S04	Surface Impoundment	Gallons; Liters; Cubic Meters; or Cubic Yards
S05	Drip Pad	Gallons; Liters; Cubic Meters; Hectares; or Cubic Yards
	Containment Building Storage	Cubic Yards or Cubic Meters
S99	Other Storage	Any Unit of Measure Listed Below
Treatment		
T01	Tank Treatment	Gallons Per Day; Liters Per Day
T02	Surface Impoundment	Gallons Per Day; Liters Per Day
T03	Incinerator	Short Tons Per Hour; Metric Tons Per Hour; Gallons Per Hour; Liters Per Hour; BTUs Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Gallons Per Day; Metric Tons Per Hour; or Million BTU Per Hour
T04	Other Treatment	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Short Tons Per Day; BTUs Per Hour; Gallons Per Day; Liters Per Hour; or Million BTU Per Hour
T80	Boiler	Gallons; Liters; Gallons Per Hour; Liters Per Hour; BTUs Per Hour; or Million BTU Per Hour

Process Code	Process	Appropriate Unit of Measure for Process Design Capacity (for T81 – T94)
Treatment (Continued)		
T81	Cement Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; BTU Per Hour; Liters Per Hour; Kilograms Per Hour; or Million BTU Per Hour
T82	Lime Kiln	
T83	Aggregate Kiln	
T84	Phosphate Kiln	
T85	Coke Oven	
T86	Blast Furnace	
T87	Smelting, Melting, or Refining Furnace	
T88	Titanium Dioxide Chloride Oxidation Reactor	
T89	Methane Reforming Furnace	
T90	Pulping Liquor Recovery Furnace	
T91	Combustion Device Used in the Recovery of Sulfur Values from Spent Sulfuric Acid	
T92	Halogen Acid Furnaces	
T93	Other Industrial Furnaces Listed in 40 CFR 260.10	
T94	Containment Building Treatment	Cubic Yards; Cubic Meters; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; BTU Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; Gallons Per Day; Liters Per Day; Metric Tons Per Hour; or Million BTU Per Hour
Miscellaneous (Subpart X)		
X01	Open Burning/Open Detonation	Any Unit of Measure Listed Below
X02	Mechanical Processing	Short Tons Per Hour; Metric Tons Per Hour; Short Tons Per Day; Metric Tons Per Day; Pounds Per Hour; Kilograms Per Hour; Gallons Per Hour; Liters Per Hour; or Gallons Per Day
X03	Thermal Unit	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; BTU Per Hour; or Million BTU Per Hour
X04	Geologic Repository	Cubic Yards; Cubic Meters; Acre-feet; Hectare-meter; Gallons; or Liters
X99	Other Subpart X	Any Unit of Measure Listed Below

Unit of Measure	Unit of Measure Code
Gallons	G
Gallons Per Hour	E
[illegible]ons Per Day	U
[illegible]s	L
[illegible]ers Per Hour	H
Liters Per Day	V
Short Tons Per Hour	D
Short Tons Per Day	N
Metric Tons Per Hour	W
Metric Tons Per Day	S
Pounds Per Hour	J
Kilograms Per Hour	X
Million BTU Per Hour	X
Cubic Yards	Y
Cubic Meters	C
Acres	B
Acre-feet	A
Hectares	Q
Hectare-meter	F
BTU Per Hour	I

..Process Codes and Design Capacities (Continued)

EXAMPLE FOR COMPLETING Item 7 (shown in line number X-1 below): A facility has a storage tank, which can hold 533.788 gallons.

Line Number		A. Process Code (From list above)			B. PROCESS DESIGN CAPACITY (1) Amount (Specify)	B. PROCESS DESIGN CAPACITY (2) Unit of Measure	C. Process Total Number of Units	For Official Use Only
X	1	S	0	2	533.788	G	001	
	1	S	0	1	150	Y	001	
	2							
	3				For purposes of compliance units are			
	4				equivalent to 325,000 pounds			
	5							
	6							
	7							
	8							
	9							
1	0							
1	1							
1	2							
1	3							

Note: If you need to list more than 13 process codes, attach an additional sheet(s) with the information in the same format as above. Number the line sequentially, taking into account any lines that will be used for "other" process (i.e., D99, S99, T04, and X99) in Item 8.

8. Other Processes (Follow instructions from Item 7 for D99, S99, T04, and X99 process codes)

Line Number (Enter #s in sequence with Item 7)		A. Process Code (From list above)			B. PROCESS DESIGN CAPACITY (1) Amount (Specify)	B. PROCESS DESIGN CAPACITY (2) Unit of Measure	C. Process Total Number of Units	For Official Use Only
X	2	T	0	4	100.00	U	001	
					N/A			

9. Description of Hazardous Wastes - Enter Information in the Sections on Form Page 5

A. EPA HAZARDOUS WASTE NUMBER – Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR Part 261, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY – For each listed waste entered in Item 9.A, estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in Item 9.A, estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE – For each quantity entered in Item 9.B, enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure, taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in Item 9.A, select the code(s) from the list of process codes contained in Items 7.A and 8.A on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all listed hazardous wastes.

For non-listed waste: For each characteristic or toxic contaminant entered in Item 9.A, select the code(s) from the list of process codes contained in Items 7.A and 8.A on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

1. Enter the first two as described above.
2. Enter "000" in the extreme right box of Item 9.D(1).
3. Use additional sheet, enter line number from previous sheet, and enter additional code(s) in Item 9.E.

2. PROCESS DESCRIPTION: If code is not listed for a process that will be used, describe the process in Item 9.D(2) or in Item 9.E(2).

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in Item 9.A. On the same line complete Items 9.B, 9.C, and 9.D by estimating the total annual quantity of the waste and describing all the processes to be used to store, treat, and/or dispose of the waste.
2. In Item 9.A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In Item 9.D.2 on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING Item 9 (shown in line numbers X-1, X-2, X-3, and X-4 below) – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operations. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

Line Number		A. EPA Hazardous Waste No. (Enter code)				B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES (1) PROCESS CODES (Enter Code)									(2) PROCESS DESCRIPTION (If code is not entered in 9.D(1))
X	1	K	0	5	4	900	P	T	0	3	D	8	0				
X	2	D	0	0	2	400	P	T	0	3	D	8	0				
X	3	D	0	0	1	100	P	T	0	3	D	8	0				
	4	D	0	0	2												Included With Above

Description of Hazardous Wastes ***(Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)***

Line Number		A. EPA Hazardous Waste No. (Enter code)				B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES									
								(1) PROCESS CODES (Enter Code)									(2) PROCESS DESCRIPTION (If code is not entered in 9.D(1))
	1	D	0	0	8	14,714	T	S	0	1							
	2	D	0	0	6												Included with above
	3	D	0	0	9												Included with above
	4	D	0	1	1												Included with above
	5	D	0	0	1												Included with above
	6	D	0	0	2												Included with above
	7	D	0	0	3												Included with above
	8	D	0	0	4												Included with above
	9	D	0	0	5												Included with above
1	0	D	0	0	7												Included with above
1	1	D	0	1	0												Included with above
1	2	U	1	5	1												Included with above
1	3																
1	4																
1	5																
	6																
	7																
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2	7																
2	8																
2	9																
3	0																
3	1																
3	2																
3	3																
3	4																
	5																
3	6																

9. Description of Hazardous Wastes ***(Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)***

Line Number		A. EPA Hazardous Waste No. (Enter code)				B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES									
								(1) PROCESS CODES (Enter Code)									(2) PROCESS DESCRIPTION (If code is not entered in 9.D.1)

The facility consists of two connected structures of approximately 18,133 square feet on approximately 1.00 acre of land located in a ML (Manufacturing Limited) zone.

The contacts and responsible parties for this facility are as follows:

Timothy M. Kimmel
VP, Facility Manager
513.641.4155 / timothy.kimmel@usalamp.com

Benny Coyt
EHS Manager
513.766.0318 / benny.coyt@cleanlites.com

Kyle Amann
Operations Manager
513.641.4155 / usalamp@usalamp.com email

B-2a: TRAFFIC INFORMATION
OAC 3745-50-44 (A)(10)

B-2a (1) Traffic patterns on-site:

Figure B-1 in this section shows movement of Waste Material to the facility from the nearest major highway and the traffic control signals encountered along the route. Figure B-2 shows an overview of the facility location.

Access from Interstate 75 at Exit 9 OH-4 / Paddock Road / Seymour Avenue, turn North (Left if coming from the South or Right if coming from the North) onto Paddock Road. Proceed approximately .4 miles to Anthony Wayne Avenue. Bear Right onto Anthony Wayne Avenue; facility entrance is at 7806 Anthony Wayne Avenue on the east side of the road; approximately .3 miles from the intersection of Paddock Road and Anthony Wayne Avenue.

B-2a (2) Estimated volume (e.g. number and types of vehicles):

The estimated volume of universal waste traffic for the USA Lamp & Ballast Recycling facility is as follows: Straight trucks (Van) entering and leaving the facility two (2) to three (3) times daily. Tractor trailers entering and leaving the facility two (2) to three (3) times daily.

Emergency Response Coordinators

EMERGENCY COORDINATOR	TELPHONE NUMBERS
PRIMARY	
Benny Coyt non-responsive	Business: (513)766-0318 Residence: non-responsive Mobile: non-responsive
SECONDARY	
Timothy M Kimmel non-responsive	Business: (513)641-4155 Residence: non-responsive Mobile: non-responsive
Kyle Amann non-responsive	Business: (513)641-4155 Residence: non-responsive Mobile: non-responsive

ATTACHMENT 7

USA LAMP & BALLAST RECYCLING, INC

Emergency Response Contingency Plan

DISTRIBUTION LIST

PERSONNEL	TITLE
Thomas M Kimmel	President and CEO
Timothy M Kimmel	VP, Facility Manager
Michael T Kimmel	Senior VP, Safety & Compliance Officer
Benny Coyt	EHS Manager
Kyle Amann	Operations Manager
Mark Amann	Driver
Ewan Blair	Retort Manager
Michael Diaz Disdier	Recycling Technician
Krista Duskin	Office Assistant
Larry Hizer	Driver
Brady Hobbs	Recycling Technician
Antony Montanez	Recycling Technician | Retort
Jaime Nieves	Recycling Technician
Donna Pechiney	Logistics Coordinator
Luiz Rios-Victor	Recycling Technician
Roberto Rivera Gonzalez	Recycling Technician
Jesus Velez Rosado	Recycling Technician
Luetta Wilson	Office Manager
Jahde Wright	Recycling Technician
Montsho Wright	Recycling Technician

EMERGENCY	TITLE
Hospital	Good Samaritan Hospital
Fire / Environmental & Safety Services	Cincinnati Fire Department
Police Dept	Police Department, Cincinnati
OH EPA Emergency Response	

USA Lamp & Ballast Recycling, Inc
Mason, MI • Milton, NY • Cincinnati, OH • Spartanburg, SC

7806 Anthony Wayne Avenue
Cincinnati, OH 45216
513.641.4155 phone / 513.641.4156 fax
usalamp@usalamp.com email

Lt Rick Jones
Cincinnati Fire Department
700 W Pete Rose Way
Lobby B, 5th Floor
Cincinnati, OH 45203

Dear Lt Jones:

USA Lamp & Ballast Recycling, Inc is a local Universal Waste facility that collects, sorts, disassembles and repackages lamps, batteries, lighting ballast, mercury-containing devices and computer / electronic equipment to be sent to the final destination facilities. As part of these operations, USA Lamp & Ballast Recycling generates and manages universal/hazardous waste. USA Lamp & Ballast Recycling, Inc requests your agreement to respond to emergencies at our facility, as appropriate for your function, upon request by USA Lamp & Ballast Recycling Facility personnel.

Enclosed for your information is a copy of the USA Lamp & Ballast Recycling Contingency Plan which can be used to familiarize your emergency response personnel with the layout of the facility, properties of the hazardous wastes handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to the facility and possible evacuation routes.

Please respond to this request in writing. A self-addressed return envelope is enclosed for your use.

If you should have any questions, please contact me at 513.641.4155 or benny.coyt@cleanlites.com.com.

Respectfully submitted,

Benny Coyt
Primary Emergency Coordinator
USA Lamp & Ballast Recycling, Inc

USA Lamp & Ballast Recycling, Inc Contingency Plan Receipt and Acknowledgement

_____
Print / Type Name and Title

_____
Signature Date

ESTIMATED CLOSURE COSTS

03/2017 Renewal

1. Processing of remaining lamp inventory
   175,000 pounds of unprocessed lamps @ $0.06 / lb $10,500.00

2. Transportation of remaining lamp inventory to third party facility $1,200.00

3. Retort mercury containing debris / residuals *(includes dry residue from clean-up process)*
   (200 drums at $240.50 per drum) $48,100.00

4. Transportation of mercury containing debris / residuals and 2 drums
   clean-up material by hazardous waste carrier $1,200.00

5. Disassemble processing equipment; decontaminate and load for transport for storage or disposal
   (16 hours at $62.50/hour) $1,000.00

6. Decontaminate facility floors, walls and ceilings
   (16 hours at $62.50 per hour) $1,000.00

7. Collect wipe samples from floors, walls and ceilings $300.00

8. Lab analysis of wipe samples (15 samples @ $53.33/analysis) $800.00

9. Complete additional facility or equipment decontamination as required by test results.
   (8 hours at $62.50 per hour) $500.00

10. Collect additional wipe samples from within facility surfaces (if necessary) $300.00

11. Lab analysis of additional wipe samples (if necessary)
    (15 samples @ $53.33/analysis) $800.00

12. Disposal of two (2) drums of hazardous waste clean-up material
    (The majority of clean-up material will be dry residue from the vacuuming process and will be included with the material sent for retort in item number 3. The remaining 2 drums of clean-up material in item number 12 will be liquid clean-up material and PPE)
    2 drums @ $1.000.00/drum $2,000.00

13. Project Management of Facility Closure by third party
    Includes report preparation for OH EPA $6,000.00

TOTAL ESTIMATED CLOSURE COSTS $73,700.00